

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES
CORPORATION,

Plaintiff,

v.

GROUPON, INC.,

Defendant.

Civil Action No. 16-122-LPS

STIPULATION AND [PROPOSED] ORDER TO AMEND SCHEDULING ORDER

Plaintiff International Business Machines Corporation (“IBM”) and Defendant Groupon, Inc. (“Groupon”) jointly stipulate, subject to the approval of the Court, that the schedule set forth in this Court’s Scheduling Order (D.I. 17) is amended as forth below:

Event	Current Date	Revised Date
Reply expert reports	November 22, 2017	December 6, 2017
IBM supplemental invalidity expert report for '601 patent	December 6, 2017	December 13, 2017
Groupon reply to IBM supplemental invalidity expert report for '601 patent	December 13, 2017	December 20, 2017
Opening Summary Judgment and Daubert Briefs	January 26, 2018	March 5, 2018
Rebuttal Summary Judgment and Daubert Briefs	February 9, 2018	March 19, 2018
Reply Summary Judgment and Daubert Briefs	February 16, 2018	March 28, 2018
Summary Judgment and Daubert Hearing	March 6, 2018	April <u>27</u> , 2018 9:00
Final Joint Proposed Pretrial Order	June 1, 2018	June 1, 2018 (unchanged)
Proposed voir dire, preliminary jury instructions, special verdict forms	June 5, 2018	June 5, 2018 (unchanged)

Event	Current Date	Revised Date
Pretrial Conference	June 8, 2018	June 8, 2018 (unchanged)
Jury Trial	July 16, 2018	July 16, 2018 (unchanged)

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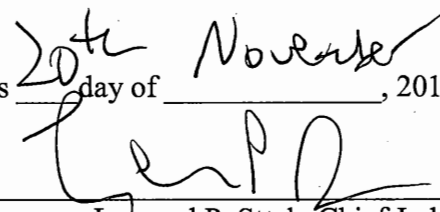
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Dated: November 17, 2017

IT IS SO ORDERED, this 20th day of November, 2017.


 Leonard P. Stark, Chief Judge